



Water Forum Submission to the Environmental Protection Agency in response to a pre-consultation engagement on the development of the National Inspection Plan for Domestic Wastewater Treatment Systems 2027-2031.

25th March 2026

Introduction

The Water Forum welcomes the briefing from the Environmental Protection Agency (EPA) to the Water Forum's Catchment Management Standing Committee on the 4th March 2026 on the National Inspection Plan for Domestic Wastewater Treatment Systems (DWWTS).

The Forum welcomes the opportunity to engage with the EPA in advance of the public consultation on this plan, which will take place later this year.

The Water Forum has a statutory role to advise the Minister for Housing, Local Government and Heritage on water policy, and to advise the Water Policy Advisory Committee in relation to the implementation of the Water Framework Directive. This National Inspection Plan (NIP) for Domestic Wastewater Treatment Systems (DWWTS) is therefore of direct relevance to the Forum, through both the need to support water and wastewater services in rural Ireland, and also to protect Ireland's water resources from the pressures of domestic wastewater.

Regulatory Overview

The Forum welcomes slide 3 in the briefing presentation, which outlines the different regulations, roles and responsibilities which are relevant to domestic wastewater treatment systems (i.e. septic tanks).

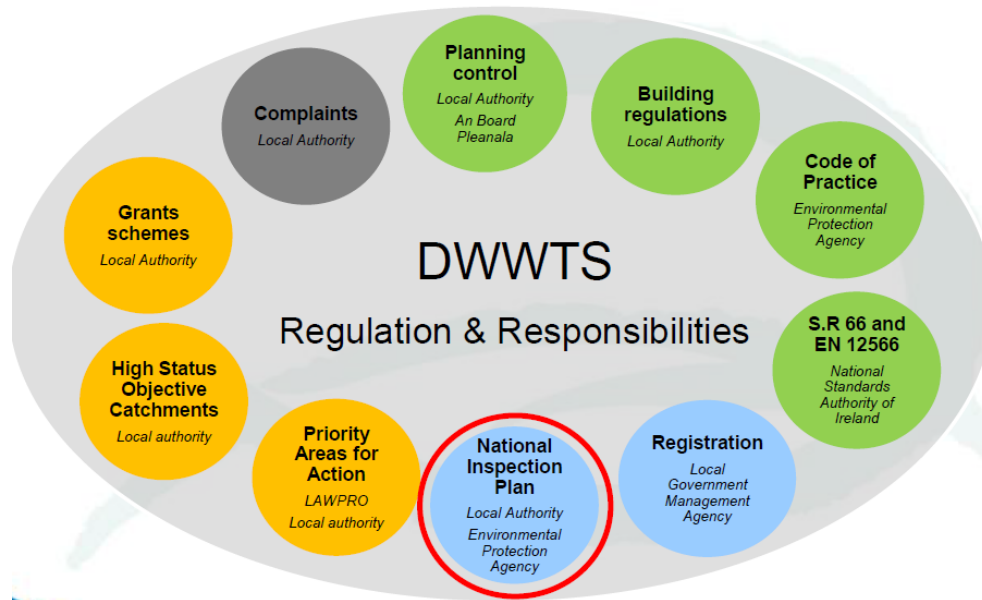


Figure 1. Slide 3 provided by the EPA outlining the regulations, roles and responsibilities in relation to domestic wastewater treatment systems.

As part of the 3rd Water Action Plan, Sectoral Action Work Plans are being developed for the tracking of national scale actions assigned to a number of sectors (e.g. Agriculture, Forestry) in the Water Action Plan 2024. The objective of the Sectoral Action Work Plans is to ensure that the sector over time will no longer be a significant pressure on water status and will include information on how the sector will address all water bodies at risk from that pressure.

Recommendation: The Forum is of the view that there should be a Sectoral Action Work Plan developed for domestic wastewater treatment systems, which should reflect slide 3 above, and incorporate the different roles and responsibilities of the leading authorities which are presented for the different elements of dealing with domestic wastewater (e.g. the national inspection plan, planning control, grant schemes, etc.).

While the Local Authorities have a leading role in the National Inspection Plan (inspections and enforcement) and in planning and building regulations related to DWWTS, the Forum is of the view that this could be better coordinated at a higher level,

for example by the DHLGH. This would facilitate a more joined up approach to accelerate action to driving down the pressures from domestic wastewater and to ensure that one element of DWWTS is not preventing progress in another element. Along with the NIP, the SAWP for domestic wastewater could include;

- engagement activities to encourage proper maintenance of DWWTS, identifying who could lead on these initiatives.
- how planning and building control could be strengthened for DWWTS (for example through follow up inspections to ensure planning permission conditions have been applied to).
- how the DHLGH grant scheme for DWWTS could be strengthened for improved access and reduced delays in closing out advisory notices.
- structured engagement between the EPA, local authorities and the DHLGH, to ensure sufficient resources are allocated for the successful implementation of the NIP.

Inspections

The Water Forum supports the risk-based methodology being proposed for the NIP, which targets inspections of DWWTS within 100m from the surface waterbody, in areas that are identified as being at-risk from domestic wastewater.

The Forum is still of the view that more inspections should be done in this Zone 1, to accelerate action to reduce domestic wastewater as a pressure on our waterbodies.

Recommendation: The Forum calls for increased ambition to have all septic tanks in Zone 1 (DWWTS within 100m of a surface water body, identified as being at-risk from domestic wastewater) inspected by the end of the next NIP, rather than over 1.5 cycles as currently proposed.

The Forum is of the view that when selecting inspection sites across Zone 1, 2 and 3, that inspections should further prioritise areas in critical source areas within delineated drinking water catchments. This would support the requirements of the recast Directive and the European Union (Drinking Water) Regulations 2023 which require the application of risk assessment and risk management within the catchment areas of drinking water supplies to protect water quality at source.

The need to align the National Inspection Plan for DWWTS with relevant EU Directives, further highlights the need for a Sectoral Action Work Plan for DWWTS (septic tanks), to

support policy coherence and identifying measures with multiple benefits for water quality and public health.

Recommendation: The Forum is of the view that when selecting inspection sites across Zone 1, 2 and 3, that inspections should further prioritise areas in critical source areas within delineated drinking water catchments.

The Forum recommends that inspections should be conducted during times when the environment is particularly at risk, for example following a period of heavy rain or flood, as this better reflects the impact of the DWWTS on the environment during higher risk conditions.

The Forum recommends that that the NIP outlines its approach to inspecting DWWTS in holiday homes, which may be located in coastal areas which have been identified as at risk from domestic wastewater.

Education and Preventative Measures

The Forum is concerned that it is currently not clear who has the overall responsibility to lead education and awareness initiatives around DWWTS (i.e. DHLGH, EPA, Local Authorities, LAWPRO). This is another reason why a SAWP for domestic wastewater should be developed to better align the different elements that are required to address domestic wastewater as a pressure on our waterbodies.

Recommendation: As the National Inspection Plan for DWWTS indicates that it sets out the requirements for public engagement activities, the Forum recommends that the NIP should outline who has the leading role in education around DWWTS and should include an action to develop a targeted Education and Awareness Campaign around the need to adequately maintain and de-sludge DWWTS.

The Forum is concerned that following inspection the failure rate of septic tanks was 56% in 2024. The failure rate following inspection has consistently been above 50% in previous reports on the NIP. The majority of the failures are related to simple, preventable measures such as maintenance or desludging the septic tank.

Recommendation: The Forum recommends that the NIP and (or SAWP for domestic wastewater) includes an action to develop a plan for targeted education and awareness initiatives to reduce the failure rate of septic tank inspections through improved maintenance and de-sludging, even without inspection.

This should include identifying and implementing community initiatives to maintain and de-sludge their septic tanks, targeting communities in areas which have been identified as at-risk from domestic wastewater. An example of a community-led septic tank de-sludging initiative is the pilot project led by the National Federation of Group Water Schemes (NFGWS) and the EPA, [On-site Wastewater Treatment Systems \(Septic Tanks\) - National Federation of Group Water Schemes](#). This pilot project was initiated as the failure rate of septic tank inspections was almost 50% in 2016, where poor management (arising largely from lack of awareness) rather than structural issues was the predominant cause of DWWTS failure.

The project proved highly successful in raising community awareness on the need to adequately maintain a septic tank. The production of information materials that focused on their particular locality had a positive impact as householders, farmers and other businesses immediately understood that they live within a drinking water source catchment and that their activities may impact negatively on that drinking water source. The project also demonstrated that significant discounts (up to 50%) can be secured from competent contractors for the desludging of multiple tanks within a catchment as part of a community-led approach. This pilot project has been followed up by other Group Water Schemes, illustrating the success of the initiative, e.g.

- [Dysart Toonagh GWS - Awards Winners In Focus](#)
- [Stranooden GWS target septic tank pollution risk](#)

The Forum is of the view that the Catchment Community Fora (CCF) being piloted in the 3rd Water Action Plan, should consider how a community initiative to address DWWTS could be implemented in their catchment.

The Forum supports the risk-based targeted inspection approach in areas where septic tanks are co-located on the same site as private wells, in areas susceptible to the percolation of pathogens (Zone 2). Due to the immediate health risk to the homeowner,

the Forum is of the view that more emphasis could be placed on targeting education in Zone 2, where the homeowner would take the initiative to properly maintain their septic tank, which would be positive as a public health measure, which has co-benefits for the water environment.

Recommendation: The Forum recommends that an Action should be added to the NIP for more targeted education and awareness in Zone 2 (where septic tanks are co-located with private wells, in areas susceptible to the percolation of pathogens) as a public health measure, outlining the health risks of poorly maintained DWWTS.